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July 30, 2025

**Via ECF**

Hon. Paul A. Engelmayer  
United States District Court  
Southern District of New York  
40 Foley Square  
New York, NY 10007

Re: *Chang v. Chang*, No. 25-CV-4917-PAE  
Motion for Leave to File Sur-reply

Judge Engelmayer:

Defendant Michael Chang respectfully submits this letter motion for leave to file a Sur-reply to Plaintiff's Reply Memorandum of Law (Dkts. 16, 17).

Defendant's proposed Sur-reply (which is attached as Exhibit A) is four pages, and it responds directly to two arguments that were newly raised in the Reply. When new arguments are made on reply, "fair play" either means they should be disregarded or—as Defendant proposes instead—an "opportunity to be heard" by him. *Newton v. City of N.Y.*, 738 F. Supp. 2d 397, 417 n.11 (S.D.N.Y. 2010).

Also attached (as Exhibit B) is an affidavit from Defendant Michael Chang, both relevant to Plaintiff's motion (Dkt. 9), Defendant's letter motion (Dkt. 18), and to this removed matter.

Defendant respectfully thanks the court for its consideration of this matter.

Dated: July 30, 2025  
New York, NY

Respectfully submitted,

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/s/ Isaac Park

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*Attorney for Defendant*

cc: All Counsel of Record (via ECF)